

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO KEEREAM JACKSON,

Defendant.

Case: 2:19-cr-20425

Judge: Friedman, Bernard A.

MJ: Patti, Anthony P.

Filed: 06-25-2019 At 03:05 PM

INDI USA V. JACKSON (kb)

Violations:

18 U.S.C. § 1951(a)

18 U.S.C. § 924(c)

18 U.S.C. § 2118(b)

18 U.S.C. § 922(g)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 1951(a)

Interference with Commerce by Robbery

On or about November 25, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did unlawfully obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in such commerce by robbery of a business; to-wit: Walgreens, located at 13550 W. Nine Mile Road, Oak Park, Michigan, in that Defendant did unlawfully take money from the presence of a store employee and against his or

her will by means of actual and threatened force, violence, and fear of injury; that is: Defendant robbed an employee at gun point, all in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

18 U.S.C. § 924(c)

Use of a Firearm During and in Relation to a Crime of Violence

On or about November 25, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally brandish, carry, and use a firearm, that is, one Glock 22 .40 handgun with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery (18 U.S.C. § 1951(a)), as alleged in Count One of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

18 U.S.C. § 1951(a)

Interference with Commerce by Robbery

On or about December 5, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did unlawfully obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in such commerce by robbery of a business; to-wit: Walgreens, located at 8706 N Telegraph Road, Dearborn Heights, Michigan, in that Defendant

did unlawfully take money from the presence of a store employee and against his or her will by means of actual and threatened force, violence, and fear of injury; that is: Defendant robbed an employee at gun point, all in violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

18 U.S.C. § 924(c)

Use of a Firearm During and in Relation to a Crime of Violence

On or about December 5, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally brandish, carry, and use a firearm, that is, one Glock 22 .40 handgun with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery (18 U.S.C. § 1951(a)), as alleged in Count Three of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

18 U.S.C. § 1951(a)

Interference with Commerce by Robbery - Attempt

On or about December 29, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did enter a business, to-wit: Walgreens, located at 23111 Lahser Road, Southfield, Michigan, with the intent to unlawfully obstruct, delay, and affect interstate commerce, and the

movement of articles and commodities in such commerce by robbery, in that Defendant intended to unlawfully take money from the presence of a store employee and against his or her will by means of actual and threatened force, violence, and fear of injury; that is: Defendant attempted to rob an employee at gun point, all in violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

18 U.S.C. § 924(c)

Use of a Firearm During and in Relation to a Crime of Violence

On or about December 29, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally brandish, carry, and use a firearm, that is, one Glock 22 .40 handgun with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is: attempted Interference with Commerce by Robbery (18 U.S.C. § 1951(a)), as alleged in Count Five of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN

18 U.S.C. § 1951(a)

Interference with Commerce by Robbery

On or about December 29, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did unlawfully obstruct, delay, and affect interstate commerce, and the movement of articles and

commodities in such commerce by robbery of a business; to-wit: Walgreens, located at 30852 Woodward Avenue, Royal Oak, Michigan, in that Defendant did unlawfully take money from the presence of a store employee and against his or her will by means of actual and threatened force, violence, and fear of injury; that is: Defendant robbed an employee at gun point, all in violation of Title 18, United States Code, Section 1951(a).

COUNT EIGHT

18 U.S.C. § 924(c)

Use of a Firearm During and in Relation to a Crime of Violence

On or about December 29, 2018, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally brandish, carry, and use a firearm, that is, one Glock 22 .40 handgun with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery (18 U.S.C. § 1951(a)), as alleged in Count Seven of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE

18 U.S.C. § 1951(a)

Interference with Commerce by Robbery

On or about March 28, 2019, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did unlawfully obstruct, delay,

and affect interstate commerce, and the movement of articles and commodities in such commerce by robbery of a business; to-wit: Walgreens, located at 22950 Van Dyke Avenue, Warren, Michigan, in that Defendant did unlawfully take money from the presence of a store employee and against his or her will by means of actual and threatened force, violence, and fear of injury; that is: Defendant robbed an employee at gun point, all in violation of Title 18, United States Code, Section 1951(a).

COUNT TEN

18 U.S.C. § 924(c)

Use of a Firearm During and in Relation to a Crime of Violence

On or about March 28, 2019, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally brandish, carry, and use a firearm, that is, one Glock 22 .40 handgun with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery (18 U.S.C. § 1951(a)), as alleged in Count Nine of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT ELEVEN

18 U.S.C. § 2118(b), 2

*Entering Premises of DEA-Registered Pharmacy with
Intent to Steal Controlled Substances*

On or about March 28, 2019, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, did knowingly and intentionally, without authority, enter and remain in the business, premises and property of a person registered with the Drug Enforcement Administration, to-wit: Walgreen's pharmacy, located at 22950 Van Dyke Avenue, Warren, Michigan, with the intent to steal controlled substances, including oxycodone and hydrocodone, which are Schedule II controlled substances, and the replacement cost of the controlled substances was more than \$500, in violation of 18 U.S.C. § 2118(b).

COUNT TWELVE

18 U.S.C. § 922(g)(1)

Possession of a Firearm by a Convicted Felon

On or about May 2, 2019, in the Eastern District of Michigan, Southern Division, the defendant, Mario Keeream Jackson, having been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, to wit: one Glock 22 .40 handgun with an extended magazine, loaded with 22 live rounds, said firearm

having previously traveled in interstate and/or foreign commerce; in violation of Title 18, United States Code, Sections 922(g)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Twelve of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

Upon conviction of the offense set forth in Counts One through Ten and Count Twelve of this Indictment, the convicted defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense, including, but not limited to, the following: one Glock 22 .40 handgun with an extended magazine.

Upon conviction of the controlled substance offense alleged in Count Eleven of this Indictment, the United States will seek a forfeiture money judgment against the convicted defendant in an amount representing the total amount of proceeds obtained as a result of the aforementioned offenses, and/or the total amount involved in the violations of 21 U.S.C. § 841.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to forfeit any property of such defendant up to the value of the forfeitable property described above.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

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Dated: June 25, 2019

United States District Court
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>DS</i>

Case Title: USA v. Mario Keeream Jackson

County where offense occurred : Wayne and Oakland

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 25, 2019

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.